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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SCOTT KOLLER, et al., on behalf of
themselves, the general public and those
similarly situated,

Plaintiffs,

v.

MED FOODS, INC., AND DEOLEO USA,
INC.

Defendants.

CASE NO. 14-cv-2400 (RS)

**DECLARATION OF ADAM J. GUTRIDE
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 9, 2018
Time: 1:30 p.m.
Courtroom 3, 17th Floor
Judge: Hon. Richard Seeborg

1 I, Adam Gutride, declare as follows:

2 1. I am a member of this Court and attorney of record for Plaintiff Rohini Kumar in this
3 action.

4 2. I am a partner in Gutride Safier LLP (“GSLLP” or “Firm”), which has been
5 appointed Class Counsel in the above-captioned matter. The information below is stated based on
6 personal knowledge. I am competent to testify to the facts set forth below, and if called as a witness
7 and placed under oath, I would testify to those facts.

8 3. I make this Declaration in support of Plaintiffs’ motion for final approval and
9 attorneys’ fees and costs and incentive awards (“Motion”). In that regard, I discuss, in the following
10 order: (a) the history of this litigation, which includes a summary description of the legal services
11 provided by GSLLP in this litigation to date; (b) the risks borne by GSLLP; (c) the time, rate,
12 expenses, and other data underlying the Motion; and (d) GSLLP’s continuing obligations in this
13 litigation and under the Settlement Agreement.

14 **A. History of the Litigation.**

15 4. On May 23, 2014, Plaintiff filed a complaint against Defendant in the above-
16 captioned case, in which Plaintiff alleged that Defendant had deceptively marketed and sold its
17 Bertolli brand of olive oil with the representation “Imported from Italy” on the front label, although
18 the back label stated that most of the oil was extracted in countries other than Italy from olives
19 grown in those other countries. Plaintiff also alleged that the “extra virgin” Bertolli olive oil
20 products were not in fact likely to be extra virgin at the point of sale and/or through the best by date,
21 due to Defendants’ failure to take appropriate steps to ensure the oil it was selling came from fresh
22 olives and was adequately protected from light and heat during shipping, storage, and sale. Plaintiff
23 further alleged that, by marketing the Products as “Imported from Italy” and “extra virgin,”
24 Defendant caused people to purchase the Products who would not otherwise have done so, and that
25 the Products were sold at a higher retail price than they would have been sold without the
26 misstatements.

27 5. GSLLP drafted and filed the Complaint and caused it to be served. Prior to doing so,

1 GSLLP spent time communicating with Plaintiff Koller concerning his claims, gathering his
2 documentation, and negotiating with him a retainer agreement. GSLLP also undertook extensive
3 pre-filing investigation, including without limitation, researching, tracking, and analyzing
4 Defendant's marketing, advertising, and product packaging, and reviewing Defendant's websites,
5 press releases, public filings, and online documents. GSLLP spent additional time analyzing Food
6 and Drug Administration ("FDA") regulations and Customs and Border Patrol ("CBP") regulations,
7 and the California Health and Safety Code. GSLLP also researched and analyzed related state
8 regulations. GSLLP also conducted research regarding potential federal preemption of Plaintiff's
9 claims. Throughout this litigation, GSLLP has continued to monitor, research, and review such
10 materials.

11 6. GSLLP also negotiated a co-counsel arrangement with Tycko & Zavareei ("TZ"),
12 which had experience prosecuting similar olive oil litigation in the District of Columbia.
13 Throughout the litigation, GSLLP worked closely with TZ to formulate case strategy. Work was
14 divided between the firms to avoid duplication. Similarly, in connection with legal research and
15 brief writing, one firm was assigned to draft all (or certain sections) of a brief, while the other
16 provided only suggestions and edits.

17 7. After filing the Complaint, Defendant filed a motion to dismiss and a request for
18 judicial notice. GSLLP reviewed Defendant's arguments and researched to draft the oppositions to
19 those motions, which were filed in August of 2014.

20 8. Shortly thereafter, GSLLP prepared and filed an errata to the Complaint. Defendant
21 objected. In response, the Court removed Defendant's motion from the calendar and ordered
22 Plaintiff to file an amended complaint. GSLLP took the lead in revising the amended complaint,
23 which was filed in September 2014.

24 9. Defendant again moved to dismiss and filed a request for judicial notice. GSLLP
25 contributed to the re-purposing and re-writing of the original opposition. I appeared and argued at
26 the hearing on these matters.

27 10. GSLLP attended at several case management conferences, and drafted and filed

1 numerous case management statements for these events. GSLLP additionally participated in the
2 negotiation and preparation of numerous case management-related stipulations.

3 11. Because the case involved two different false advertising theories, litigation was
4 more complicated than the average consumer case. First, Plaintiff would be required to prove that
5 Defendant's "Imported from Italy" representation was unlawful and misleading; so doing required
6 discovery into such things as Defendant's olive oil sourcing practices, its advertising campaigns,
7 and its policies for complying with federal and state regulations. On the other hand, proving that
8 Defendant's olive oil was not truly extra virgin and/or that Defendant failed to take adequate steps
9 to ensure its olive oil was "extra virgin" would require a much different strategy. In addition to
10 needing discovery about consumer behavior and advertising, as well as Defendant's olive oil
11 production processes, including the harvesting and milling of olives, bottling methods, and shipping
12 and storage practices, Plaintiff needed information from both Defendant and external sources on
13 olive oil chemistry and industry practices. The damages analysis for each of the two theories
14 required different evidence as well.

15 12. Throughout the litigation, GSLLP consulted with various experts and third parties.
16 For example, GSLLP worked extensively with an expert and laboratory in Australia to test the olive
17 oil for quality, consulting them frequently about strategy at class certification and trial, discovery
18 responses, and other case management issues. GSLLP also regularly consulted with Colin Weir, an
19 economics expert, about damages methodologies. In addition, GSLLP regularly consulted with
20 other third parties to obtain information about the olive oil industry.

21 13. Throughout this case, GSLLP participated in the discovery efforts, including drafting
22 and serving discovery on Defendant and third parties. Because of the dual theories, discovery was
23 complicated and hard fought. Among other things, Plaintiff propounded one lengthy set of requests
24 for production and two sets of interrogatories. Defendants responded, often refusing to produce
25 basic categories of information and utilizing lengthy objections. Multiple rounds of meet and confer
26 efforts were required. GSLLP participated in all of these meet and confer calls, some of which were
27 more than two hours long.

1 14. GSLLP also led met-and-confer efforts with Defendant's counsel regarding other
2 more general discovery matters, such as the retention of electronic documents, Defendant's searches
3 for electronically stored information, the terms and scope of a stipulated protective order, and the
4 timing of production.

5 15. Defendant also served extensive discovery requests, including numerous document
6 requests and interrogatories on Plaintiff. GSLLP participated in the drafting of these responses, and
7 also spearheaded the efforts to gather documents and address concerns by Defendant in its meet and
8 confer efforts.

9 16. GSLLP also took part in briefing discovery disputes in this matter regarding the
10 timing of discovery, Defendant's request to take foreign discovery from an Australian olive oil
11 testing laboratory, and Plaintiff's request to take foreign discovery from Defendant's Italian olive
12 oil suppliers. GSLLP travelled to and attended an in person meet and confer with Defendants in
13 Los Angeles, and also attended an in person meet and confer with Defendants in San Francisco.
14 GSLLP also prepared for and participated in a discovery conference in January 2017.

15 17. In total, over 100,000 pages of documents were produced in this case, and GSLLP
16 assisted in the document review efforts in this case.

17 18. GSLLP also took three depositions of Defendants' employees, who were designated
18 as 30(b)(6) witnesses and who appeared in their individual capacities. GSLLP defended the
19 deposition of Plaintiff. GSLLP defended the deposition of Plaintiff's expert on olive oil and
20 Plaintiff's economics expert. GSLLP took the deposition of Defendant's economics expert, and
21 assisted with the preparations for the deposition of Defendant's expert on olive oil.

22 19. After obtaining significant discovery from Defendant in this case, GSLLP took the
23 lead role in research for, drafting, and filing Plaintiff's Motion for Class Certification, which was
24 filed in October 2015. As part of this work, GSLLP helped to prepare lengthy declarations from
25 Plaintiff's expert on olive oil quality and from Plaintiff's damages expert. GSLLP also prepared the
26 Administrative Motion to File Under Seal. In the weeks that followed, GSLLP engaged in
27 negotiations with Defendant as to Defendant's purported need for discovery to prepare its

1 opposition, the schedule for filing that opposition, and Defendant's plans to seek a stay of the
2 proceedings. In connection with these negotiations, in November 2015, GSLLP prepared a Status
3 Report to the Court and negotiated the language of Letter of Request to the Central Authority of
4 Australia in connection with Defendant's efforts to take discovery from the laboratory that Plaintiff
5 used to conduct the olive oil testing.

6 20. In late 2015, Defendant filed a motion to stay the case, asserting that it was necessary
7 to provide the Ninth Circuit an opportunity to hear three class certification-related cases. GSLLP
8 edited and filed an opposition to that motion. After the Court granted that motion in December
9 2016, GSLLP monitored the status of the cases before the Ninth Circuit.

10 21. In September 2016, GSLLP assisted with the drafting and filing of a motion to lift
11 the stay and prepared a reply. While the Court denied the motion, GSLLP continued to monitor the
12 status of the cases before the Ninth Circuit, and alerted the Court to the resolution of the matter of
13 *Briseno v. ConAgra Foods, Inc.*, 844 F3d 1121 (9th Cir.), in January 2017. At that point, the Court
14 lifted the stay.

15 22. GSLLP then negotiated a schedule with Defendant for the completion of class
16 certification briefing. In March 2017, Defendant filed its opposition, which included evidentiary
17 objections. GSLLP took the lead in drafting and filing the reply brief, as well as a new
18 administrative motion to seal. I appeared and argued at the hearing on this motion on April 13,
19 2018.

20 23. After the Court granted Plaintiff's Motion for Class Certification in August 2017,
21 Defendants filed a Rule 23(f) petition. GSLLP took the lead in researching, drafting, and filing the
22 opposition to that motion, which was denied in November 2017.

23 24. In September 2017, GSLLP also assisted in the preparation and filing of a motion for
24 partial summary judgment.

25 25. In the summer and fall of 2017, I am informed that TZ was contacted by numerous
26 other victims of Defendant's false advertising, including those in states other than California. Six of
27 these individuals retained TZ and GSLLP to represent them. TZ prepared a complaint for one of the

1 new plaintiffs, which GSLLP reviewed.

2 26. Throughout the litigation, the parties had been discussing settlement. In particular,
3 Seth Safier and I remained in regular communication with counsel for Defendant, frequently
4 discussing settlement options. Eventually, Defendant agreed to attend mediation. Thereafter, the
5 parties negotiated a tolling agreement on behalf of the other new plaintiffs. GSLLP assisted with
6 this process.

7 27. GSLLP attended an all day mediation in November 2017 before the Hon. Edward
8 Infante of JAMS, the former chief magistrate judge in the Northern District of California and an
9 experienced mediator. While an agreement was not reached that day, the parties continued to
10 negotiate, eventually reaching agreement in the weeks that followed.

11 28. After an agreement in principle was reached, GSLLP took the lead on negotiating
12 and drafting the Settlement Agreement along with corresponding documents, including claim forms,
13 summary notice, and long form notice.

14 29. Because the parties were able to arrive at a nationwide settlement, GSLLP assisted
15 with the drafting and filing of a Second Amended Complaint in this matter, which asserted
16 nationwide claims consistent with the nationwide settlement class contemplated by the Settlement
17 Agreement.

18 30. In late January 2018, the Ninth Circuit issued its decision in *In re Hyundai and Kia*
19 *Fuel Economy Litigation*, 881 F.3d 679 (9th Cir. 2018), which imposed heightened standards on the
20 certification of nationwide settlement classes. In response, GSLLP engaged in extensive research
21 and analysis on the various consumer protection laws and common laws of all fifty states and the
22 District of Columbia to determine which causes of action could be certified on a nationwide basis
23 and to ensure that all settlement class members were adequately represented.

24 31. After the parties entered into the Settlement Agreement, GSLLP participated in the
25 drafting and filing of the motion for preliminary approval of the settlement and its supporting
26 documents. In connection with this work, GSLLP took the lead on preparing summaries of its
27 research on the various consumer protection laws, submitted as appendices to that motion. (Dkt.

1 #144.) GSLLP also negotiated a stipulation on the filing of the Second Amended Complaint.

2 Finally, GSLLP prepared the proposed order on preliminary approval, which this Court entered on
3 April 24, 2018.

4 32. After filing the motion for preliminary approval of the settlement, GSLLP supervised
5 the work of the claims administrator in this matter. For example, my colleagues and I tested the
6 operation of the settlement website, and my associate and I have corresponded with the claims
7 administrator regarding the notice and claims process, including regarding inquiries from class
8 members. GSLLP will continue to participate in these efforts throughout and following the claims
9 process.

10 33. GSLLP also participated in the drafting and filing of the instant motion for final
11 approval of the settlement, and I will appear at the hearing on that motion.

12 34. Should any objections to the settlement be filed prior to the hearing on final
13 approval, GSLLP will assist in the research and response to those objections by, if necessary, filing
14 oppositions to them and/or a reply memorandum in support of the motion for final approval of the
15 settlement.

16 35. After engaging in all of the aforementioned tasks, as a partner with GSLLP, I am in a
17 unique position to evaluate this Settlement. Indeed, in advising the Representative Plaintiff whether
18 or not to enter into the Settlement Agreement, I was very cognizant of the risks involved in
19 protracted litigation. I was also cognizant of Defendant's size and financial resources.

20 36. When considering the risks and costs associated with proceeding to trial against the
21 nature of the benefit that was being offered by Defendant, it was clear that the Settlement is in the
22 best interests of the class. Indeed, with this Settlement, Plaintiff has achieved his desired goal in this
23 litigation—i.e., obtaining for class members cash refunds and changes to Defendant's labeling
24 practices. Based on my evaluation of the facts and legal issues presented, I believe that the
25 settlement is fair, adequate, and reasonable. Indeed, I believe this is an excellent settlement.

26 37. Plaintiff Koller is requesting an incentive award of \$5,000. Plaintiff Koller took on
27 the risk of the possibility of bearing Defendant's costs in a losing effort. He worked with counsel to

1 provide information and respond to discovery throughout the litigation. Koller conducted searches
2 of his records. He also spent a good deal of time preparing for and being deposed. He is also
3 entering into a broader release.

4 38. The six other Plaintiffs, Carolyn Bissonnette, Cece Castoro, Diane Gibbs, Darlene
5 Williams, Robert Glidewell, and Stephen Freiman, are requesting incentive awards of \$1,000 to
6 compensate them for representing absent class members and executing a broader release.

7 39. Plaintiff has been actively involved in the litigation prior to and after this Settlement. In
8 my opinion, Plaintiff's participation in this litigation has been exemplary.

9 **B. The Risks Borne By GSLLP.**

10 40. In accepting this case, GSLLP bore considerable risk. GSLLP took this case on a fully
11 contingent basis, meaning that we were not paid for any of our time, and that we paid all costs and
12 out of pocket expenses without any reimbursement to date. From the outset, GSLLP recognized that
13 it would be contributing a substantial amount of time and advancing significant costs in prosecuting
14 a nationwide class action, with no guarantee of compensation or recovery, in the hopes of prevailing
15 against a well-funded defense. During the course of the litigation, GSLLP turned away other cases
16 due to its involvement with this matter. Among these were cases that were subsequently filed by
17 other firms.

18 41. Because Defendant was represented by a large, highly-skilled and well-resourced
19 litigation firm, there was increased risk that Plaintiffs would receive a verdict for the Defense after a
20 prolonged trial.

21 **C. Lodestar and Expenses for GSLLP**

22 42. A true and correct copy of the firm resume of GSLLP was submitted in connection with
23 the motion for preliminary approval.

24 43. GSLLP has worked on two other matters related to olive oil marketing practices that
25 contain allegations similar to those in this case. GSLLP has maintained separate billing records for
26 this case under the case name "Defendant" and for each of the two other cases. In addition, because
27

certain tasks in the three matters have sometimes overlapped, GSLLP has maintained separate billing records under the case name “OliveOil” for general work performed related to all three matters. With respect to the “OliveOil” work, GSLLP is only seeking to recover for one-third of the total of 374.3 hours, or 124.8 hours of time.

44. Based on the time records of GSLLP as described in the preceding paragraph, GSLLP has spent approximately 1968 hours prosecuting this litigation through May 31, 2018.¹ The total number of hours billed, as well as the lodestar computed at our 2018 rates, is as shown in the following table:

Timekeeper	Hours (Defendant)	Hours (1/3 of OliveOil)	Total Hours	Rate	Total
Adam J. Gutride	321.2	52.9	374.1	\$975	\$364,715.00
Seth A. Safier	404.3	45.6	449.9	\$950	\$427,405.00
Kristen Simplicio	924.0	5.8	929.8	\$800	\$743,813.33
Marie McCrary	46.5	0.1	46.6	\$850	\$39,581.67
Matt McCrary	125.4		125.4	\$775	\$97,185.00
Todd Kennedy		20.5	20.5	\$850	\$17,396.67
Anthony Patek	6.1		6.1	\$800	\$3,240.00
Ashley Garcia	16.2		16.2	\$200	\$4,880.00
TOTAL	1827.5	124.8	1952.3		\$1,698,216.67

45. The hourly rates shown for the attorneys at GSLLP are the same as the regular rates charged in 2018. The persons shown above are all attorneys, except for Ashley Garcia who is a

¹ Time for January 2017 has not yet been entered by some timekeepers, so January time is omitted from these totals. GSLLP will update its lodestar and costs in a reply declaration, as necessary.

1 legal assistant.

2 46. On March 16, 2018, Judge Winifred Smith of the Alameda County Superior Court
3 approved our regular 2017 billing rates of \$950 for me, \$925 for Seth Safier, \$775 for Kristen
4 Simplicio, \$750 for Marie McCrary, and \$725 for Matt McCrary, in a similar olive oil labeling
5 matter, *Kumar v. Safeway, Inc.*, Case No. RG 14726707. These rates 2017 rates were also approved
6 on July 7, 2017 by Judge Gonzales Rogers in the third olive oil labeling matter handled by GSLLP,
7 *Kumar v. Salov North America Corp.*, Case No. 14-cv-2411 (N.D.Cal.). On December 5, 2017,
8 Judge Claudia Wilken approved GSLLP's 2017 rates in *Rainbow Business Solutions v. MBF*
9 *Leasing*, Case No. 10-cv-1993 (N.D.Cal.). On February 24, 2016, Judge Peter Kirwan of the Santa
10 Clara County Superior Court approved rates GSLLP's 2015 rates of \$825 for me and \$800 for Seth
11 Safier in *Mackinnon v. IMVU, Inc.* Case No. 111 CV 193767.

12 47. I am a 1994 graduate from Yale Law School. Seth Safier is a 1998 graduate from
13 Harvard Law School. Ms. Simplicio is 2007 graduate of the American University, Washington
14 College of Law. Ms. McCrary is a 2008 graduate of New York University Law School. Mr.
15 McCrary is a 2009 graduate of University of Texas at Austin Law School. Mr. Kennedy is a 2003
16 graduate of Yale Law School. Mr. Patek is a 2003 graduate of the UC Berkeley Boalt School of
17 Law.

18 48. I and Mr. Safier were previously attorneys at the law firm of Orrick Herrington &
19 Sutcliffe. It is my understanding that attorneys at that firms in the litigation departments, with the
20 same number of years of experience as myself and Mr. Safier are currently billing at hourly rates in
21 excess of \$1000 for law school graduates from 1994 and 1998. Similarly, the billing rates of Mr.
22 McCrary, Ms. McCrary, Mr. Patek and Mr. Kennedy would all be higher had they remained at their
23 prior firms, which include Quinn Emanuel, Cooley, and Baker & McKenzie. I believe that my firm's
24 hourly rates are below market for attorneys with similar backgrounds and experience.

25 49. Expenses are accounted for and billed separately and are not duplicated in my
26 professional billing rate. GSLLP has not received reimbursement for expenses incurred in
27 connection with this litigation. As of May 31, 2018, my firm incurred a total of \$99,528.84 in

unreimbursed actual third-party expenses in connection with the prosecution of these cases. The actual expenses incurred in the prosecution of these cases are reflected on the computerized accounting records of my firm prepared by bookkeeping staff, based on receipts and check records, and accurately reflect all actual expenses incurred. Some of the expenses included below are known to us but yet to be invoiced or have been invoiced but not yet paid. The expenses that have yet to be invoiced, for example, include expenses for courtesy copies of this Motion and expenses associated with traveling to the final approval hearing and are estimated based on my experience. A complete breakdown of all expenses is attached as Exhibit A. To summarize, the expenses are as follows:

Expense Category	Amount
Arbitrators/Mediators (E121)	7450.00
Court Fees (E112)	400.00
Delivery Services & Messengers (E107)	3,508.53
Deposition Transcripts (E115)	11,446.80
Experts (E119)	48,803.69
Litigation Support Vendors (E118)	16,197.89
Local Travel (E109) ²	493.79
Meals (E111)	1,277.11
Online Research (E106)	370.02
Other (E124) ³	2780.31
Out-of-Town Travel (E110)	5,347.93
Outside Printing (E102)	770.57
Postage (E108)	682.20
TOTAL	99,528.84

² Includes taxis, and parking, tolls, and mileage for automobiles owned by GSLLP timekeepers.

³ This category includes expenses for the purchases of products to test, CourtCall fees, and notice and advertising to class members.

D. Plaintiffs' Counsel Continuing Obligations to Class Members

50. Following this Court granting preliminary approval to the Settlement, Class Counsel established standardized procedures to ensure that all inquiries from Class Members were timely and accurately handled. I am not aware of any feedback from class members that would suggest that the process is onerous or complicated. Class Counsel also worked the Claim Administrator to assure that settlement website functioned properly, was easy to use and properly designed. Class Counsel also worked with the Claims Administrator to assure that notice was disseminated in accordance with the terms of the Settlement Agreement. I received weekly updates from the Claims Administrator regarding the administration of the settlement. GSLLP will continue in this capacity should the settlement be finally approved. GSLLP will prepare for and appear at the fairness hearing. If the settlement is approved and fees awarded, GSLLP also will oppose any appeals that may be filed. Based on my experience with class actions, I additionally anticipate that there will be another 50-75 hours of work before this Litigation is entirely complete and an estimated 175-250 hours if this Court's judgment is appealed.

This declaration was executed this 28th day of June, at Berkeley, California. I state the foregoing under penalty of perjury under the laws of the United States.

/s/ Adam J. Gutride
Adam J. Gutride, Esq.

EXHIBIT A

Deoleo Costs
Gutridge Safier LLP

					Deoleo	Date Paid			
Ordinary Income/Expense									
Expense									
				Arbitrators/Mediators (E121)	7,450.00				
						10/10/17	JAMS		7,450.00
				Court Fees (E112)	400.00				
						5/23/14	US District Court	Filing fee	400.00
				Delivery Svcs & Msgs (E107)	3,508.53				
						3/6/14	Fedex Kinkos	Shipment of olive oil for testing	397.62
						6/12/14	S&R Services	Summons, Complaint svd on Med Foods	120.00
						6/13/14	S&R Services	Summons, Complaint served on Deoleo	45.00
						9/16/14	S&R Services	Chambers Copy, Judge Seeborg, First Amended Complaint	45.00
						10/7/14	S&R Services	Chambers Copy, Judge Seeborg, change of address	65.00
						10/13/14	S&R Services	Chambers Copy Judge Seeborg, opposition to motion to dismiss	45.00
						10/29/14	A and A Legal Service	Service of Subpoenas on Third Party Retailers	89.00
						10/29/14	A and A Legal Service	Service of Subpoenas on Third Party Retailers	656.00
						10/29/14	A and A Legal Service	Service of Subpoenas on Third Party Retailers	937.00
						10/29/14	A and A Legal Service	Service of Subpoenas on Third Party Retailers	158.00
						5/1/15	A and A Legal Service	Service of Subpoenas on Data Brokers	229.25
						11/3/15	Lone Star Legal LLC	Chamber's Copies, USDC, San Francisco (motion for class certification)	229.02
						1/4/17	S&R Services	Chamber's Copy for Judge Seeborg (statement of recent decision)	50.00
						1/30/17	S&R Services	Chamber's Copy for Judge Spero (discovery dispute letter)	50.00
						4/5/17	Lone Star Legal LLC	USDC, SF (class cert reply)	150.64
						9/21/17	S&R Services	Court Copy Jdg Seeborg, motion for summary judgment	50.00
						11/2/17	S&R Services	Deoleo Mediation Stmt, Deliver to Jdg Infante	70.00
						4/5/18	S&R Services	Chamber's Copy to Judge Seeborg - Prelim Approval Motion	122.00
									3,508.53
				Deposition Transcripts (E115)	11,446.80				
						12/29/15	Nogara Reporting Service	7/21/15 - Margarita Rogers	1,656.44
						12/29/15	Nogara Reporting Service	7/22/15 - Mary Roy	1,748.69
						12/29/15	Nogara Reporting Service	7/23/15 - Gene Russell	1,609.16
						12/30/15	Harmonic Videographer	8/31/15 - Rogers, Roy, & Russell	1,262.00
						12/30/15	Elnce Videographer	6/16/15 - Sylvia Donnini & Carlos Jimenez Ot in Spain	350.00
						4/28/16	Esquire Deposition Solutions	1/13/16 - Colin B. Weir	1,420.95
						2/5/16	Esquire Deposition Solutions	2/5/16 - Rodney Mailer, Ph.D.	1,132.10
						3/17/17	Dean Markham	Ugone Deposition Video	425.00
						4/5/17	Veritext	4/5/17 - Depo of Keith Ugone	1,842.46
									11,446.80
				Experts (E119)	48,803.69				
						5/1/14	Australian Oils Research	Olive Oil Expert	801.08
						10/29/15	Australian Oils Research	Olive Oil Expert	5,181.11
						11/7/15	Economics and Technology Inc.	Damages Expert	8,833.33
						12/8/15	Australian Oils Research	Olive Oil Expert	6,750.00
						3/1/16	Economics and Technology Inc.	Damages Expert	4,531.25
						3/1/16	Economics and Technology Inc.	Damages Expert	1,050.00
						3/7/16	Australian Oils Research	Olive Oil Expert	7,992.92
						3/21/16	Australian Oils Research	Olive Oil Expert	285.00
						4/5/17	Economics and Technology Inc.	Damages Expert	12,875.00
						5/26/17	Australian Oils Research	Olive Oil Expert	504.00
									48,803.69
				Litigation Sup Vendors (E118)	16,197.89				
							Logik Systems	Data Management - 3/15-11/17	14,452.08
						12/12/17	CS Disco	Data Management - 11/17 - 2/18	600.00
						2/2/18	CS Disco	Data Management	483.41
						4/4/18	CS Disco	Data Management	89.83
						4/9/18	CS Disco	Data Management	95.61
						6/2/18	CS Disco	Data Management	476.96
									16,197.89
				Local Travel (E109)	493.79				
						2/25/14	Mileage - 200 miles		112.00
						9/8/14	Uber	local meeting	10.54
						9/8/14	Uber	local meeting	13.36
						12/18/14	CCSF MTA Civic Cntr Garage	Parking	5.92
						12/30/14	Total Mileage - 2014	Gutridge	8.40
						1/16/15	CCSF MTA Civic Cntr Garage	Parking - motion to dismiss hearing	1.25

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